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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15 BARON BEMENT,

16 Plaintiff,

17 vs.

18 STATE OF NEVADA DEPARTMENT OF
19 CORRECTIONS,

20 Defendant.

CASE NO. 3:12-cv-00475-MMD-WGC

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
NDOC TO FILE MOTION FOR
SUMMARY JUDGMENT**

(First Request for this Pleading, Third
Request for Entire Case Since Remand to
District Court)

21 Defendant, State of Nevada, *ex rel* its Department of Corrections, and Plaintiff, Baron
22 Bement, by and through their respective attorneys, hereby stipulate and agree to extend
23 Defendant's time to file its Motion for Summary Judgment by twenty-eight (28) days, up to and
24 including April 4, 2018. The current deadline for Defendant's Motion is March 7, 2018.

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1 Good cause exists for the extension due to defense counsel's litigation schedule and
2 upcoming administrative hearings. This is the first extension of time requested to file this
3 motion by Defendant, and this Stipulation is made in good faith and not for purposes of delay.

4 RESPECTFULLY SUBMITTED this 20th day of February, 2018.

5 BY: /s/ Brian Morris
6 BRIAN MORRIS, ESQ.
7 5455 South Fort Apache Road,
8 Suite 108-151
9 Las Vegas, Nevada 89148
10 *Attorney for Plaintiff*

ADAM PAUL LAXALT
ATTORNEY GENERAL

BY: /s/ Kevin A. Pick
KEVIN A. PICK
Deputy Attorney General
5420 Kietzke Lane, Suite 202
Reno, NV 89511
Attorneys for Defendant

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12 **ORDER**

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14 IT IS SO ORDERED this 23rd day of February, 2018.

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18 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), the undersigned hereby certifies that she is an employee of the State of Nevada Office of the Attorney General and is a person of such age and discretion as to be competent to serve papers. That on February 20, 2018, the undersigned filed a true and accurate copy of the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT NDOC TO FILE MOTION FOR SUMMARY JUDGMENT** with the United States District Court, using CM/ECF Electronic Filing, which will e-serve the following electronically:

Brian R. Morris, Esq.
brmorris@lawforthepeople.com

/s/ _____
An employee of the State of Nevada
Office of the Attorney General